

1 Charles R. Messer (SBN 101094)
2 MesserC@cmtlaw.com
3 David J. Kaminski (SBN 128509)
4 KaminskiD@cmtlaw.com
5 Stephen A. Watkins (SBN 205175)
6 WatkinsS@cmtlaw.com
7 CARLSON & MESSER LLP
8 5959 W. Century Boulevard, Suite 1214
9 Los Angeles, California 90045
10 t: (310) 242-2200 f: (310) 242-2222
11

12 Attorneys for Defendants,
13 THE CMI GROUP, INC., THE CMI GROUP GP, LLC
14 and CREDIT MANAGEMENT, LP.
15

16 UNITED STATES DISTRICT COURT

17 CENTRAL DISTRICT OF CALIFORNIA
18

19 JOSHUA BROWN, on behalf of
20 himself and all others similarly
21 situated,

22 Plaintiffs,

23 vs.

24 DIRECTV, LLC; THE CMI
25 GROUP, INC., THE CMI GROUP
26 GP, LLC and CREDIT
27 MANAGEMENT, LP.,
28

Defendants.

Case No. 2:12-cv-08382-DMG-E

**JOINT NOTICE OF
SETTLEMENT AND REQUEST
TO VACATE COURT-ORDERED
DEADLINES**

TO THE COURT, PARTIES, AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that Defendants THE CMI GROUP, INC., THE CMI GROUP GP, LLC and CREDIT MANAGEMENT, LP (collectively “CMI”), and Plaintiff JOSHUA BROWN (“Plaintiff”) have agreed to settle in principle, on an individual basis, all claims brought by Plaintiff against CMI, including an agreement that CMI will pay all “reasonable attorneys’ fees and costs.” The parties request that the Court vacate the October 18, 2013, deadline for Plaintiff to file a motion for class certification and all future calendared dates. The parties seek to resolve the meaning of the term “reasonable attorneys’ fees and costs” informally. In this regard, the parties agree to, within thirty (30) days, either file a Notice of Dismissal or report to the Court.

DATED: October 17, 2013

LEIFF CABRASER HEIMANN &
BERSTEINBy: /s/ Daniel M. HutchinsonDaniel M. Hutchinson
Attorneys for Plaintiff,
JOSHUA BROWN

DATED: October 17, 2013

CARLSON & MESSER LLP

By: /s/ David J. KaminskiDavid J. Kaminski
Charles R. Messer
Stephen A. Watkins
Attorneys for Defendants,
THE CMI GROUP, INC., THE CMI
GROUP GP, LLC and CREDIT
MANAGEMENT, LP.

{LCHB_iManage_1136268_1rev.docx;1}

NOTICE OF SETTLEMENT
2:12-cv-08382-DMG-E